

options claim 800 numbers generally are recognized as a free means for contacting businesses, which understanding is diminished when non-traditional uses are also tied to the 800 SAC.

27. The proponents of partitioning fail to consider several points. First and foremost, the 800 numbers that serve pagers and voice mail boxes generally are used for business and/or mixed business and personal purposes, which means that the suggested demarcation has no integrity. Second, callers of 800 numbers have grown accustomed to reaching pagers and voice mail boxes meaning that uses of this nature do peaceably co-exist with other business uses. Third, this proposal presumes that moving non-traditional users to the 888 SAC will cause little harm due to the shorter history of use and due to smaller usage volumes.<sup>69/</sup> Their assumption is incorrect.

28. Partitioning fails to meet the underlying objective of the Commission's proposal. The Commission's primary concern is to delay exhausting 800 numbers. Partitioning offers no immediate solution to this problem.<sup>70/</sup> Non-business users cannot be moved to the 888 SAC until it is opened. Once the new SAC is available, the

---

<sup>69/</sup> As PCIA points out, the underlying assumption that paging and other messaging services are low volume users is inaccurate. Comments of PCIA, p. 5; see also Comments of PageNet, p. 8-9.

<sup>70/</sup> See Comments of Bass Pro, p. 7; MCI, p. 8.

immediate number shortage will be relieved and future problems will be unlikely as additional toll free SACs will already be planned for release. So, partitioning would only occur after the current number crisis is resolved. It makes no sense to discriminate against any categories of users at this point.

29. Indeed, all of these arguments are exactly the same as those raised time and time again in the context of new NPA's. The Commission has decided that requiring different NPA's for different users may be discriminatory. AirTouch Paging and Arch fail to understand the difference between the 800 SAC and any other NPA.

30. Partitioning also fails as a long term solution to business users. Even if non-traditional users were relegated to the new SAC, the 800 SAC would still eventually be exhausted, thus placing businesses in the position of having to use a different SAC regardless of what SAC non-businesses are using. The only difference will be that, in the interim, a category of non-business and personal users will have been singled out unfairly for disparate treatment.<sup>21/</sup>

31. In sum, it would be unwise and unfair to take 800 numbers away from any isolated group of subscribers in

---

<sup>21/</sup> See Comments of PCIA, 12-13.

deference to the requests of traditional business customers.<sup>72/</sup> Rather than undermining the positive growth of 800 number usage in new market segments,<sup>73/</sup> the industry would be better served by Commission rules which ensure that those who want and need toll free numbers can have them.

**VII. Number Reservation Limitation Proposals Must be  
Rejected in Favor of Adopting the ICCF Guidelines**

32. The Commission requested comments on proposals that place limits on the ability of individual organizations and the industry as a whole to secure toll free numbers. The proposals were categorized under topics discussing the need for pre-reservation periods, reservation caps, phased implementation of the new SAC, circuit breakers, limited Mechanized Generic Interface reservations, and changes to the SMS database design itself. When reviewing comments where parties chose to respond to these

---

<sup>72/</sup> It should be noted that if a right of first refusal is granted while also partitioning users, the Commission would exacerbate the property rights problem. If the user has a property right, then is moving them to a new SAC due to partitioning akin to a taking? If the user has a right of first refusal, he may secure the reciprocal 888 number and use that to meet the partitioning requirement. Does this mean the user cannot also keep the 800 number or does the partition trump such that the user is moved to the 888 SAC before the right of first refusal attaches? Should the Commission adopt its partitioning and right of first refusal proposals against the advice of AirTouch Paging and Arch, the inter-relationship between the rules must be established.

<sup>73/</sup> See Comments of PCIA, p. 4.

topic areas, it is apparent that the solutions put forth in each comment area are similar. The proposals should, therefore, be reviewed together to eliminate redundancies and to ensure that only the optimal solution is implemented.

33. First, several commenters familiar with the structure and functioning of the SMS database noted that the system currently can handle 100,000 transactions per day.<sup>74/</sup> One commenter suggested that, following the opening of the 888 SAC, system processing should be divided so that 65,000 transactions are allocated to reserving, assigning, and placing numbers in working status.<sup>75/</sup> The remaining 35,000 should be used for suspensions, etc.<sup>76/</sup> These same commenters noted that the datalinks providing access to the system have limited capacity. To increase the number of transactions that can be handled per day would require a time consuming redesign of the system. The datalinks are more easily added and allow a greater number of simultaneous users to access the system. They may also speed-up data processing through faster transmission. They do not, however, affect the total number of transactions that can actually be completed daily. If the industry expects a greater number of daily transactions to be

---

<sup>74/</sup> See Comments of Ameritech, p. 19; Bell South, p. 9; NYNEX, p. 5.

<sup>75/</sup> See Comments of NYNEX, p. 5.

<sup>76/</sup> Id.

attempted, the industry must decide whether it will grow the system or will limit the number of transactions. As AirTouch Paging and Arch do not have access to projected transaction data, it is not clear which of the above choices is more feasible. It is preferable, however, that the number of transactions allowed per day not be limited.

34. The Commission's goal of ensuring that the supply of toll free numbers can fairly meet demand is a proper goal. The rules the Commission adopts from this proceeding to help meet this goal may differ for current versus future requirements. Near term allocation and transition measures should be focused on delaying depletion of numbers. Longer term plans should be aimed at optimizing number allocation so that only parties with a real intent to use the them are able to reserve, use, and suspend numbers. Both plans must also take into account that a party's ability to participate in the market varies based on its size and financial security. Keeping the above in mind, AirTouch Paging and Arch make the recommendations discussed below.

35. Many commenters support a pre-reservation period of 45 days before the 888 system is available.<sup>27/</sup> This plan allows the industry to get a head-start on allocating 888 numbers. Numbers would not be placed in

---

<sup>27/</sup> See, e.g. Comments of ACTA, p. 14; Ameritech, p. 18; AT&T, p. 14; Bell Atlantic, p. 5; LDDS, p. 7; MCI, p. 13; NYNEX, p. 5-6; PageNet, p. 11.

working status before the official cut date, but the early start is thought to be a useful safety value to prevent overtaxing the SMS database as a result of the onslaught of orders sure to come when 888 numbers are actually made available. AirTouch Paging and Arch support this proposal.

36. Concerns were raised over the use of electronic access to the SMS database by large RespOrgs.<sup>78/</sup> The parties complained that the Mechanized Generic Interface ("MGI") allows RespOrgs to download a large quantity of numbers in a short period of time. As part of this download, the RespOrg also has the ability to secure blocks with highly desirable numbers. The RespOrgs counter by stating that all users have access to the MGI if they determine it is in their interest to invest in the software and hardware.<sup>79/</sup> Because there is no discrimination as to who can use the system, RespOrgs state its use should not be regulated. Other parties argue they either cannot afford or are technologically incapable of accessing the system, so even though it is available, they are precluded from using MGI.<sup>80/</sup> These users suggest each party accessing the database be limited to a set period of time and a set

---

<sup>78/</sup> See Comments of ACTA, p. 13; SWBT, p. 9.

<sup>79/</sup> See Comments of MCI, p. 11; Sprint, p. 9; US West, p. 12.

<sup>80/</sup> See Comments of SWBT, p. 9; TRA, p. 11.

quantity of numbers which can be reserved.<sup>81/</sup> Small RespOrgs strongly recommend this option when the 888 SAC is first made available. They are less committed to keeping the safeguard in place once the initial rush is over. Some commenters also suggest a rule that sets aside highly desirable numbers from the remainder of the database and allocates these numbers one at a time.<sup>82/</sup>

37. Reservation caps were also proposed by the Commission. Comments varied both as to the need for the cap and on its design. Many commenters support reservation caps arising from the Industry Guidelines for 800 Number Administration.<sup>83/</sup> These guidelines specify 15% of total working numbers as the cap on reservations for each RespOrg. Modifications of these guidelines have been used as a means for stemming exhaustion of the 800 SAC. Cap levels suggested for the period following implementation of the 888 SAC include 15%,<sup>84/</sup> 10%,<sup>85/</sup> 8%<sup>86/</sup> and 3%<sup>87/</sup>. Parties

---

<sup>81/</sup> See Comments of LDDS, p. 7.

<sup>82/</sup> See Comments of Ameritech, p. 16-17; MFS, p. 8. Contra Comments of MCI, p. 12 (stating that identifying highly desirable numbers would be nearly impossible).

<sup>83/</sup> See Comments of PacBell, Attachment A.

<sup>84/</sup> See, e.g., Comments of Ameritech, p. 26-27; LCI, p. 8; MCI, p. 8; Promoline, p. 5.

<sup>85/</sup> See, e.g., Comments of LDDS, p. 12; Telco Planning, p. 5.

<sup>86/</sup> See Comments of ATIS, p. 16; AT&T, p. 22-23; Scherers, p. 14.

discussing these plans cite the need to balance between limiting reservations in the belief that over-reserving leads to warehousing and the need to accommodate fluctuations in business by providing flexibility in the number of reservations allowed at any given time. Smaller organizations raise the additional concern that percentages favor larger businesses because they may secure more numbers at any given time. They suggest a flat quantity be set for all users.<sup>88/</sup> AirTouch Paging and Arch reject the use of reservation caps, except for those in place for the purpose of delaying the exhaustion of the 800 SAC, as an approach which over-regulates the industry without any data to support the need to do so.

38. A majority of parties commenting on circuit breakers agree with AirTouch Paging and Arch in rejecting their use as being an overly burdensome conservation method.<sup>89/</sup> A majority of those who did support their use, did so only in exhaust circumstances. Finally, the SMS database is not programmed to handle circuit breakers. A system upgrade will take time and could possibly delay

---

<sup>87/</sup> (...continued)

<sup>87/</sup> See, e.g., Comments of Unitel, p. 3.

<sup>88/</sup> See Comments of NEXTLINK, p. 5.

<sup>89/</sup> See, e.g., Comments of Ameritech, p. 41; Bell Atlantic, p. 11; NYNEX, p. 10; PCIA, p. 7; Sprint, p. 25. Arguments include the fact that multiple systems would have to be upgraded to accommodate the circuit breaker and that RespOrgs would be artificially limited from reserving numbers when no substantive reason exists to do so.



introduction of the 888 SAC -- something the industry cannot afford. If the SAC is introduced before the circuit breakers are in place, the order surge will have passed, thus obviating the need for circuit breakers. The Commission's proposal to apply circuit breakers as a means for regulating individual operator's daily take of numbers was firmly rejected by this majority. The Commission should not, therefore, mandate the use of circuit breakers.

39. Each of the above proposals addresses concerns that numbers are not being used in the best manner possible. In its comment, AirTouch Paging encouraged the industry to adopt the ICCF guidelines<sup>20/</sup> for number allocation. The guidelines, operating on a first-come-first-serve basis, allow numbers to be reserved as needed by RespOrgs and contain measures that prevent a number from sitting idle. This proposal makes the most long-term sense because it is truly need-driven. Reservation caps create artificial limits that fail to take into account the natural peaks and valleys in demand that any RespOrg reasonably encounters. Using the ICCF guidelines meets the concerns of all parties by allowing people to take what they need as determined by rigorous forecasting efforts. Should the RespOrg or subscriber miscalculate their needs, safety valves within the system recapture unused numbers while also

---

<sup>20/</sup> ICCF Central Office Code (NNX/NXX) Assignment Guidelines, § 7. (10/26/94 Revision).

making additional numbers available when business uncertainties create unpredictable demand. This plan, in conjunction with rules which impose stiff penalties for abuse, accommodates all industry participants regardless of size or financial strength. It should also have the calming affect needed to curb the instinct to reserve numbers "just in case" a number shortage arises.<sup>91/</sup> Once the new SAC is available and the industry regains its confidence that their demands will be met, the urge to reserve unnecessary numbers will be replaced by rationale ordering. Reservation caps, circuit breakers and any other models which artificially limit number reservation will not be needed.<sup>92/</sup>

---

<sup>91/</sup> See Comments of USTA, p. 2.

<sup>92/</sup> See Comments of PCIA, p. 14.

**Conclusion**

The foregoing premises having been duly considered, AirTouch Paging and Arch respectfully request that the Commission pursue toll free SAC management with due regard for the foregoing reply comments.

Respectfully submitted,

**AIRTOUCH PAGING  
ARCH COMMUNICATIONS GROUP**

By: 

Carl W. Northrop  
Their Attorney

Mark Stachiw  
AirTouch Paging  
Three Forest Plaza  
12221 Merit Drive, Suite 800  
Dallas, Texas 75251  
(214) 458-5212

Carl W. Northrop  
Bryan Cave LLP  
700 Thirteenth Street, N.W.  
Suite 700  
Washington, D.C. 20005  
(202) 508-6000

November 20, 1995

124360.03

**SERVICE LIST**

I, Pamela D. Frye, a secretary with the law firm of Bryan Cave LLP, hereby certify that a copy of the foregoing Joint Reply Comments of AirTouch Paging and Arch Communications Group was sent first class, postage prepaid, United States mail or hand-delivered on November 20, 1995, to the following:

Chairman Reed E. Hundt  
**STOP CODE 0101**  
Federal Communications Commission  
1919 M Street, N.W.  
Room 814  
Washington, D.C. 20554

Commissioner Andrew C. Barrett  
**STOP CODE 0103**  
Federal Communications Commission  
1919 M Street, N.W.  
Room 826  
Washington, D.C. 20554

Commissioner Susan Ness  
**STOP CODE 0104**  
Federal Communications Commission  
1919 M Street, N.W.  
Room 832  
Washington, D.C. 2055

James Keegan  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W.  
Room 500  
Washington, D.C. 20554

International Transcription  
Services, Inc.  
(ITS, Inc.)  
2100 M Street, N.W.  
Suite 140  
Washington, D.C. 20037

Lawrence F. Chesto  
Director of Telecommunications  
Systems  
Aeronautical Radio Inc.  
2551 Riva Road  
Annapolis, MD 21401

Laura H. Phillips  
Counsel for The Ad Hoc Coalition  
of Competitive Carriers  
Dow, Lohnes & Albertson  
Suite 500  
1255 23rd Street, N.W.  
Washington, D.C. 20037

Commissioner James H. Quello  
**STOP CODE 0106**  
Federal Communications Commission  
1919 M Street, N.W.  
Room 802  
Washington, D.C. 20554

Commissioner Rachelle B. Chong  
**STOP CODE 0105**  
Federal Communications Commission  
1919 M Street, N.W.  
Room 844  
Washington, D.C. 20554

Linda Dubroof  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W.  
Room 500  
Washington, D.C. 20554

Office of Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Werner K. Hartenberger  
Counsel for The Ad Hoc Coalition  
of Competitive Carriers  
Dow, Lohnes & Albertson  
Suite 500  
1255 23rd Street, N.W.  
Washington, D.C. 20037

J.G. Harrington  
Counsel for The Ad Hoc Coalition  
of Competitive Carriers  
Dow, Lohnes & Albertson  
Suite 500  
1255 23rd Street, N.W.  
Washington, D.C. 20037

Susan M. Miller  
Vice President and General Counsel  
Alliance for Telecommunications  
Industry Solutions, Inc.  
1200 G Street, N.W.  
Suite 500  
Washington, D.C. 20005

Roy L. Morris  
Director  
Allnet Communication Services  
1990 M Street, N.W.  
Suite 500  
Washington, D.C. 20036

Gregory M. Scott  
Counsel for American Car  
Rental Association  
3050 K Street, N.W.  
Washington, D.C. 20007

C. Douglas Jarrett  
Counsel for American Petroleum  
Institute  
1001 G Street, N.W.  
Suite 500 West  
Washington, D.C. 20001

Charles H. Helein  
Counsel for Americas Carrier  
Telecommunications Association  
8180 Greensboro Drive  
Suite 700  
McLean, VA 22102

Gary L. Phillips  
Counsel for Ameritech  
1401 H Street, N.W.  
Suite 1020  
Washington, D.C. 20005

Ed Leer  
Vice President, Corporate Network  
The Associated Group  
1099 N. Meridian Street  
Suite 1100  
Indianapolis, IN 46204

Peter H. Jacoby  
AT&T Corp.  
Room 3244J1  
295 North Maple Avenue  
Basking Ridge, NJ 07920

Larry Hall  
Director Information Systems  
Auto Club of Missouri  
12901 North Forty Drive  
St. Louis, MO 63141

Albert Halprin  
Counsel for Avis Rent  
A Car Systems, Inc.  
Halprin, Temple, Goodman & Sugrue  
Suite 650, East Tower  
1100 New York Avenue, N.W.  
Washington, D.C. 20005

T. Michael Jankowski  
Counsel for American Car  
Rental Association  
3050 K Street, N.W.  
Washington, D.C. 20007

Wayne V. Black  
Counsel for American Petroleum  
Institute  
1001 G Street, N.W.  
Suite 500 West  
Washington, D.C. 20001

Glenn S. Richards  
Counsel for American Telegram  
Corporation  
2001 Pennsylvania Avenue, N.W.  
Suite 400  
Washington, D.C. 20006

Darlene D. Roberts  
Americom Network  
24724 Eden Avenue  
Hayward, CA 94545

R.D. Goodman  
Chief Executive Officer  
Applied Anagramics, Inc.  
P.O. Box 9035  
Santa Rosa, CA 95405

Mark C. Rosenblum  
AT&T Corp.  
Room 3244J1  
295 North Maple Avenue  
Basking Ridge, NJ 07920

Judy Sello  
AT&T Corp.  
Room 3244J1  
295 North Maple Avenue  
Basking Ridge, NJ 07920

Kathleen Ritchie  
Avery Dennison Corporation  
One Clarks Hill  
Aramingham, MA 01701-8164

Melanie Haratunian  
Counsel for Avis Rent  
A Car Systems, Inc.  
Halprin, Temple, Goodman & Sugrue  
Suite 650, East Tower  
1100 New York Avenue, N.W.  
Washington, D.C. 20005

John M. Goodman  
Counsel for the Bell Atlantic  
Telephone Companies  
1133 20th Street, N.W.  
Washington, D.C. 20036

Richard M. Sbaratta  
Counsel for BellSouth  
Telecommunications, Inc.  
4300 Southern Bell Center  
675 West Peachtree Street  
Atlanta, GA 30375

Rachel J. Rothstein  
Cable & Wireless, Inc.  
8219 Leesburg Pike  
Vienna, VA 22182

Matthew O'Brien  
President  
Communications Managers Assoc.  
1201 Mt. Kemble Avenue  
Morristown, NJ 07960-6628

Richard C. Bartel  
President  
Communications Venture Services  
5526 Wisconsin Avenue  
P.O. Box 70805  
Chevy Chase, MD 20813-0805

Wayne C. Rapp  
Vice President  
Crestar Bank  
7818 Parham Road  
Richmond, VA 23294

Barbara Fliszar  
Manager, Customer Communications  
Department  
Del Webb Corporation  
6001 North 24th Street  
Phoenix, AZ 85016

Ian D. Volner  
Counsel for Direct Marketing  
Association  
Venable, Baetjer, Howard  
& Civiletti, LLP  
1201 New York Avenue, N.W.  
Suite 1000  
Washington, D.C. 20005

M. Robert Sutherland  
Counsel for BellSouth  
Telecommunications, Inc.  
4300 Southern Bell Center  
675 West Peachtree Street  
Atlanta, GA 30375

Helen A. Shockey  
Counsel for BellSouth  
Telecommunications, Inc.  
4300 Southern Bell Center  
675 West Peachtree Street  
Atlanta, GA 30375

Deena M. Mistretta  
Cable & Wireless, Inc.  
8219 Leesburg Pike  
Vienna, VA 22182

Linda Hamilton  
Director  
Communications Managers Association  
1201 Mt. Kemble Avenue  
Morristown, NJ 07960-6628

Genevieve Morelli  
Vice President and General Counsel  
The Competitive Telecommunications  
Association  
1140 Connecticut Avenue, N.W.  
Suite 220  
Washington, D.C. 20036

Joel DeFabio  
Suite 430  
2121 Ponce De Leon Boulevard  
Coral Gables, FL 33134

Napoleon Barragan  
President  
Dial A Mattress  
31-10 48th Avenue  
Long Island City, NY 11101

N. Frank Wiggins  
Counsel for Direct Marketing  
Association  
Venable, Baetjer, Howard  
& Civiletti, LLP  
1201 New York Avenue, N.W.  
Suite 1000  
Washington, D.C. 20005

Braden L. Lutz  
1.800.BALLOON  
371 Eighth Avenue, #C-1  
San Diego, CA 92101

Richard Guglielmi  
800 Courier, Inc.  
117 Lincoln Court  
Cape Coral, FL 33904

Dr. Kevin Grolld  
President  
1-800-Therapist Network  
2923 Camino Del Mar  
Suite 6  
Del Mar, CA 92014

Coleen Boothby  
Counsel for 800 Users Coalition  
1300 Connecticut Avenue, NW  
Suite 500  
Washington, D.C. 20036-1703

William B. Wilhelm, Jr.  
Counsel for Enterprise Rent-A-Car  
Swidler & Berlin  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007

Robert R. Duguay  
President  
Fruit Baskets Unlimited  
P.O. Box 88  
141 South Main Street  
Beacon Falls, CT 06403

Jody B. Burton  
Assistant General Counsel  
Personal Property Division  
General Services Administration  
Office of Congressional and  
Intergovernmental Affairs  
Washington, D.C. 20405

Allen E. Danzig  
Senior Staff Counsel  
The Hertz Corporation  
225 Brae Boulevard  
Park Ridge, NJ 07656

Tracey T. Powell  
Chairman & CEO  
Home Access Health Corporation  
2401 West Hassell Road  
Suite 1510  
Hoffman Estates IL 60195-5200

Bruce J. Shulman  
Chief Executive Officer  
1-800-Budget Getaways  
5728 Major Boulevard  
Suite 200  
Orlando, FL 32819

Christopher G. McCann  
Vice President  
1-800-Flowers  
1600 Steward Avenue  
Westbury, N.Y. 11590

Alan J. Werksman  
Counsel for 800 Tickets  
International, Inc.  
160 S.W. 12th Avenue  
Suite 101B  
Deerfield Beach, FL 33442-3102

Catherine Wang  
Counsel for Enterprise Rent-A-Car  
Swidler & Berlin  
3000 K Street, N.W.  
Suite 300  
Washington, D.C. 20007

Robert Johnson  
First Digital  
5627 Sepulveda Boulevard  
Suite 213  
Van Nuys, CA 91411

G. Murray Greer  
Greer Marketing Group  
19412 Pompano Lane  
Suite 111  
Huntington Beach, CA 92648-6420

William E. Carpenter, Jr.  
MIS/EDI Manager  
Heartland Express  
2777 Heartland Drive  
Coralville, IA 52241

Doug Hicks  
1607 Pinellas Road  
Belleair, FL 34616

Rick Sellers  
President  
The Huntington Service Company  
P.O. Box 1558  
Columbus, OH 43216

Charlie Swan  
Industrial Packing, Inc.  
P.O. Drawer N  
River Road  
Bucksport, Maine 04416

Glen A. Payne  
Senior Vice President  
Secretary and General Counsel  
Investco Funds Group  
7800 East Union Avenue  
Denver, CO 80237

Michael Singh  
Lifescan Inc.  
1000 Gibraltar Drive  
Milpitas, CA 95035-6312

Douglas W. Kinkoph  
Director, Regulatory/Legislative  
Affairs  
LCI International, Inc.  
8180 Greensboro Drive, Suite 800  
McLean, VA 22102

Donald J. Elardo  
MCI Telecommunications Corp.  
1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Russell M. Blau  
Swindler & Berlin  
3000 K Street, N.W.  
Washington, D.C. 20007

Orest R. Fiume  
Senior Director - Network Services  
Nabisco  
7 Campus Drive  
P.O. Box 311  
Parsippany, NJ 07054-0311

Christy C. Kunin  
Blumenfeld & Cohen  
1615 M Street, N.W., Suite 700  
Washington, D.C. 20036

Michael Lammers  
Noritsu Corp.  
6900 Noritsu Avenue  
Buena Park, CA 90622-5039

Lu Ann S. Hardy  
Ingersoll-Rand  
800-D Beaty Street  
P.O. Box 1840  
Davidson, NC 28036

Murray D. Ryan  
Director  
Telecommunications Services  
Johns Hopkins University  
Nichols House B5  
3400 N. Charles Street  
Baltimore, MD 21218-2690

Katie Jenkins  
The Loewen Group Inc.  
4126 Norland Avenue  
Burnaby, B.C.  
V5G 3S8

Loretta Garcia  
MCI Telecommunications Corp.  
1801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20006

Andrew D. Lipman  
Swindler & Berlin  
3000 K Street, N.W.  
Washington, D.C. 20007

Richard G. Miller  
Vice President  
Mueller Industries Inc.  
2959 N. Rock Road  
P.O. Box 789761  
Wichita, KS 67278-9761

Adrienne J. Melillo  
Manager Operations  
Network Telephone Services, Inc.  
6233 Variel Avenue  
Woodland Hills, CA 91367

William Rassman, M.D.  
New Hair Institute  
9911 W. Pico Blvd., Suite 301  
Los Angeles, CA 90035

David Cosson  
NTCA  
2626 Pennsylvania Avenue, N.W.  
Washington, D.C. 20037



Pamela Sower  
NTCA  
2626 Pennsylvania Avenue,  
N.W. Washington, D.C. 20037

Pat Todia  
Director  
Oceans Eleven Resorts Inc.  
2025 South Atlantic Avenue  
Daytona Beach Shores, FL 32118

Gail P. Meyer  
Olsten Corporation  
175 Broad Hollow Road  
Melville, NY 11747-8905

Alan F. Ciamporcerro  
Pacific Telesis  
1275 Pennsylvania Ave, N.W.  
Washington, D.C. 20004

Margaret. E. Garber  
Pacific Telesis  
1275 Pennsylvania Ave, N.W.  
Washington, D.C. 20004

Sarah Rubenstein  
Pacific Bell  
140 New Montgomery Street  
Rm. 1522A  
San Francisco, CA 94105

Judith St. Ledger-Roty  
Reed Smith Shaw & McClay  
1301 K Street, N.W.  
Suite 1100 East Tower  
Washington, D.C. 20005

Mark J. Golden  
Vice President of Industry Affairs  
Personal Communications  
Industry Association  
1019 19th Street, N.W.  
Suite 1100  
Washington, D.C. 20036

Edwin. N. Lavergne  
Ginsburg, Feldman & Bress  
1250 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Joe D. Edge  
Drinker, Biddle & Reath  
901 Fifteenth Street, N.W.  
Suite 900  
Washington, D.C. 20005

William J. Balcerski  
NYNEX  
1111 Westchester Avenue  
White Plains, NY 10604

Mark D. Olson  
410 W. Badillo Street, 2nd Floor  
Covina, CA 91723

Lisa M Ziana  
General Counsel  
21 Dupont Circle, N.W. Suite 700  
Washington, D.C. 20036

James L. Wurtz  
Pacific Telesis  
1275 Pennsylvania Ave, N.W.  
Washington, D.C. 20004

Lucile M. Mates  
Pacific Bell  
140 New Montgomery Street  
Rm. 1522A  
San Francisco, CA 94105

Joseph Edward Page  
4365 Executive Drive, #700  
San Diego, CA 92121-2126

Lee A. Rau  
Reed Smith Shaw & McClay  
1301 K Street, N.W.  
Suite 1100 East Tower  
Washington, D.C. 20005

Jane A. Murphy  
Philbricks Sports SuperStore  
161 Portland Avenue  
Dover, NH 03820

Darren L. Nunn  
Ginsburg, Feldman & Bress  
1250 Connecticut Avenue, N.W.  
Washington, D.C. 20036

Sue W. Bladek  
Drinker, Biddle & Reath  
901 Fifteenth Street, N.W.  
Suite 900  
Washington, D.C. 20005

Elizabeth A. Marshall  
Drinker, Biddle & Reath  
901 Fifteenth Street, N.W.  
Suite 900  
Washington, D.C. 20005

Joan E. Neal  
Morrison & Foerster  
2000 Pennsylvania Avenue, N.W.  
Suite 5500  
Washington, D.C. 20006

Nissan Rosenthal  
1351 E. 10th Street  
Brooklyn, NY 11230

Robert M. Schwimer  
1-800 BEARGRAM  
c/o SISCO  
1390 Richmond Terrace  
Staten Island, NY 10310

Eugene J. Baldrate  
Director - Federal Regulatory  
227 Church Street  
New Haven, CT 06506

Durward D. Durpe  
Southwestern Bell Telephone  
Company  
One Bell Center, Room 3520  
St. Louis, Missouri 63101

Richard Grigorian  
South Windsor Arena & Sports Complex  
585 John Fitch Blvd., Route 5  
South Windsor, CT 06074

Leon M. Kestenbaum  
Sprint Corp.  
1850 M Street, N.W.  
Suite 1110  
Washington, D.C. 20036

Norina T. Moy  
Sprint Corp.  
1850 M Street, N.W.  
Suite 1110  
Washington, D.C. 20036

Cheryl A. Tritt  
Morrison & Foerster  
2000 Pennsylvania Avenue, N.W.  
Suite 5500  
Washington, D.C. 20006

Gordon Bloom  
Vice President  
Information Technology  
Roadway Package System, Inc.  
P.O. Box 108  
Pittsburgh, PA 15230

Susan Drombetta  
Manager - Rates and Tariffs  
Scherers Communications Group  
575 Scherers Court  
Worthington, OH 43085

Gary V. Pack  
Senior Corporate Attorney  
Service Merchandise  
P.O. Box 24600  
Nashville, TN 37202-4600

Robert Lynch  
Southwestern Bell Telephone Co.  
One Bell Center, Room 3520  
St. Louis, Missouri 63101

J. Paul Walters, Jr.  
Southwestern Bell Telephone Co.  
One Bell Center, Room 3520  
St. Louis, Missouri 63101

Michael Zivich  
Telecommunications Manager  
Spiegel, Inc.  
800 Pasquinelli Drive  
Westmont, IL 60559

Jay C. Keithley  
Sprint Corp.  
1850 M Street, N.W.  
Suite 1110  
Washington, D.C. 20036

Ronald L. Sarget  
President  
Contract and Commercial  
Staples, Inc.  
8 Technology Drive, Suite 200  
Westborough, MA 01581

Robert L. Stitt  
600 W. 107th Street, Apt. 208  
Kansas City, MO 64114-5927

D. Kelly Daniels  
Telco Planning, Inc.  
808 The Pittock Block  
921 S.W. Washinting Street  
Portland, OR 97205

Charles C. Hunter  
Hunter & Mow, P.C.  
1620 I Street, N.W.  
Suite 701  
Washington, D.C. 20006

W.E. Miller, Jr.  
President  
Telecompute Corp.  
1275 K Street, Suite G-9  
Washington, D.C. 20005

Victoria A. Schlesinger  
Regulatory Attorney  
Telemation International, Inc.  
6707 Democracy Blvd.  
Suite 800  
Bethesda, MD 20817

Frank T. Judge, III  
Timex Corporation  
Middlebury, CT 06762-0310

Erick Fishman  
Counsel for TLDP Communications  
Fletcher, Heald & Hildreth, PLC  
1300 North 17th Street  
11th Floor  
Rosslyn, VA 22209

J. Kristen Liesemer  
Unitel Communications Inc.  
200 Wellington Street West  
Toronto, Ontario  
M5V 3G2

Mary McDermott  
U.S. Telephone Association  
1401 H Street, N.W.  
Suite 600  
Washington, D.C. 20005

Paul Robinson  
Tansin A. Darcos & Co.  
8604 Second Avenue, # 104  
Silver Spring, MD 20910

Bradley W. Prentiss  
Telco Planning, Inc.  
808 The Pittock Block  
921 S.W. Washinting Street  
Portland, OR 97205

Kevin DiLallo  
Hunter & Mow, P.C.  
1620 I Street, N.W.  
Suite 701  
Washington, D.C. 20006

Gregory M. Casey  
Telemation International, Inc.  
6707 Democracy Blvd.  
Suite 800  
Bethesda, MD 20817

John F. Gillen  
President  
Tel Mark Sales, Inc.  
526 W. Wisconsin Avenue  
Appleton, Wisconsin 54911

David R. Poe  
Counsel for Time Warner  
Communications Holdings, Inc.  
LeBoeuf, Lamb, Greene  
& MacRAE, L.L.P.  
1875 Connecticut Avenue, N.W.  
Suite 1200  
Washington, D.C. 20009

Janice DuBose  
Trench Shoring Services  
6770 East 56th Avenue  
Commerce City, CO 80022

John V. Kenny  
President/Chief Operating Officer  
U.S. Strategies Corp.  
1055 N. Fairfax Street  
Suite 201  
Alexandria, VA 22314

Linda Kent  
U.S. Telephone Association  
1401 H Street, N.W.  
Suite 600  
Washington, D.C. 20005

Charles D. Cosson  
U.S. Telephone Association  
1401 H Street, N.W.  
Suite 600  
Washington, D.C. 20005

Gregory L. Cannon  
Counsel for US West  
Communications Inc.  
Suite 700  
1020 19th Street, N.W.  
Washington, D.C. 20036


Rodney C. Elser  
Vice President  
Westvaco  
1011 Boulder Springs Drive  
Richmond, VA 23225

M. Joe Wiseman  
Senior Analyst  
Wise Telecommunications  
P.O. Box 4615  
Lafayette, LA 70502

Richard S. Whitt  
Director, Federal Regulatory Affairs  
Worldcom, Inc.  
1120 Connecticut Avenue, N.W.  
Suite 400  
Washington, D.C. 20036

Robert C. Rowe  
Senior Vice President and General  
Counsel  
World Savings and Loan Assoc.  
1901 Harrison Street  
Oakland, CA 94612

Len Dozois  
President  
Zachary Software, Inc.  
106 Access Road  
Norwood, MA 02062

  
Pamela D. Frye